

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MONTANA
GREAT FALLS DIVISION

Susan Webber and Jonathan St. Goddard,

Plaintiffs,

vs.

U.S. DEPARTMENT OF HOMELAND
SECURITY; KRISTI NOEM in her official capacity;
and THE UNITED STATES OF AMERICA,

Defendants.

DECLARATION OF SUSAN WEBBER

I, Susan Webber, under penalty of perjury declare as follows:

1. I live and work in Browning, Montana, on the Blackfeet Nation. I am an enrolled member of the Blackfeet Tribe. I have relatives and often visit on the Canada side of the border.
2. In November of 2024 I was re-elected to represent Montana Senate District 8, which includes about 20,000 residents. Senate District 8 encompasses the Blackfeet Nation, abuts the border of Montana and Canada, and includes portions of the Confederated Salish and Kootenai Nation.
3. From 2015 to 2022 I was a representative in the Montana State Legislature, representing Montana House District 16, which includes Browning and most of the Blackfeet Nation, and goes up to Canada.
4. My District includes the border crossings at the Piegan/Carway crossing on Highway 89 and the Del Bonita border crossing on Chalk Butte Road on Highway 213.
5. My constituents are members of the Blackfeet Tribe as well as other tribes across Montana. I also represent enrolled tribal members from the Salish and Kootenai tribes on the

western side of my District.

6. My constituents are living and working in an area that cannot afford random, unpredictable tariffs on businesses and personal goods. The costs of living are already high, and housing and childcare are big expenses. The families, businesses, and communities that I represent and live in will be immediately and irreparably harmed by the increased costs of goods from the tariffs that are being universally imposed out of the blue.

7. I represent ranchers and businesses that regularly do business across the border of Canada, importing goods for commerce, for the tribal community, and for personal use, and who are injured by the tariffs in their personal and business lives and in the business that is conducted on the Blackfeet and CSKT Nations. One example is the area at Whiskey Creek where people regularly go back and forth across the border and do business without regard to the border. They will be hurt by tariffs that require them to travel to different ports of entry, and impose charges they have never had to pay before.

8. The people I represent have personal and business relationships across the U.S. Canada border that go back for generations. Goods brought into our communities come across at ports of entry that are exclusively within tribal lands. The tariffs will cause harm through the unexpected increased costs but also through the unpredictable way they are hitting us, making it impossible to plan or prepare. My constituents can't absorb sudden increased costs like this, and it will create a real hardship for many of us, and our businesses. The tariffs will have an immediate, material and negative effect on our community if they are allowed to go into effect.

9. Contracts will be and have been cancelled as a result of the tariffs and the increased costs they are forcing on us. Small, Native American owned and operated businesses, hiring and employing Native Americans to work for them, are critical to our economy. We

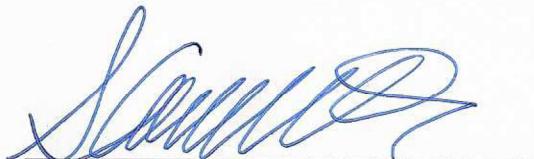
cannot afford to absorb a 25% tariff; it has already had severe negative impacts, and those will continue. The random and sudden way the tariffs are being imposed also causes harm, because no one can plan or budget.

10. Contracts to build houses and for other commercial businesses have been cancelled. Those contracts would have brought additional commerce and income to the Blackfeet Nation. Our construction and tourism season is very short, and these tariffs are coming right at the time when we need to be able to lock in pricing and lay out a budget for the season. We are completely caught off guard by the tariffs and the way they are being imposed, and that is hurting our communities. The tariffs will hurt construction and tourism, two of our big incomes, and our communities will experience irreparable harm if they are not stopped.

11. The tariffs have a disproportionate and immediate impact on us. The costs are passed along immediately to customers, who cannot afford to move forward with planned projects, resulting in a direct loss to our community, and an indirect loss through lost wages, lost projects, and lost income from projects that will not go forward.

12. Because of the tariffs, members of the tribal community are losing economic opportunities and business. As a result of not knowing when projects will be funded and if tariffs will continue, employers have laid people off. This is wreaking havoc on my community and creating immediate, irreparable harm. I declare under penalty of perjury, on this 3rd day of April, 2025, that the foregoing is true and correct to the best of my knowledge, information, and belief.

Executed on April 4, 2025


Susan Webber